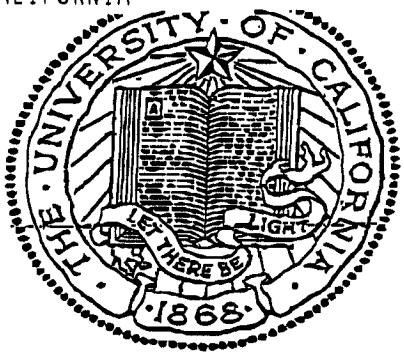

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THE OFFICE OF FEDERAL GOVERNMENT RELATIONS

FACSIMILE TRANSMITTAL SHEET

TO: Stephen Johnson	FROM: Scott Sudduth
COMPANY:	DATE: 9-27-07
FAX NUMBER:	TOTAL NO. OF PAGES INCLUDING COVER: 4
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A. SCOTT SUDDUTH
Assistant Vice President

September 27, 2007

The Honorable Stephen Johnson, Administrator
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Johnson:

I am writing to clarify that the attached letter on which the name and seal of the University of California, Berkeley appears represents the views of the distinguished scientists who have signed it. It should not be interpreted as an official statement of the University of California or any of its campuses.

If you have any questions, please do not hesitate to call me.

Sincerely,

A. Scott Sudduth

A. Scott Sudduth
Assistant Vice President

cc: Vice Chancellor for Research Burnside
Associate Chancellor/Chief of Staff Cummins
Director Trinkle

Cornell University
College of Arts and Sciences

UNIVERSITY OF CALIFORNIA
BERKELEY

September 24, 2007

Mr. Stephen Johnson, Administrator
United States Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Mr. Johnson,

We are writing to urgently request your assistance in preventing the registration of methyl iodide for use as a soil fumigant. As chemists and physicians familiar with the effects of this chemical, we are concerned that pregnant women and the fetus, children, the elderly, farm workers, and other people living near application sites would be at serious risk if methyl iodide is permitted for use in agriculture (80-275 pounds per acre).

We have several concerns about a decision that would allow indiscriminate release of methyl iodide into the environment, summarized below.

Methyl iodide is a highly reactive chemical used in some industrial processes and in research laboratories for the synthesis of new molecules. Alkylating agents like methyl iodide are extraordinarily well-known cancer hazards in the chemical community because of their ability to modify the chemist's own DNA, as well as the target molecule in the flask, leading to mutations that are potentially very harmful. Because of this potential toxicity, chemists who work with this material use the smallest amounts possible and take great precautions to avoid exposure. Because of methyl iodide's high volatility and water solubility, broad use of this chemical in agriculture will guarantee substantial releases to air, surface waters and groundwater, and will result in exposures for many people. In addition to the potential for increased cancer incidence, U.S. EPA's own evaluation of the chemical also indicates that methyl iodide causes thyroid toxicity, permanent neurological damage, and fetal losses in experimental animals. EPA's exposure assessment suggests that the Agency is willing to accept exposures at levels that may cause these effects in humans up to five percent of the time near the application site.

We are skeptical of U.S. EPA's conclusion that the high levels of exposure to methyl iodide that are likely to result from broadcast applications are "acceptable" risks. U.S. EPA has made many assumptions about toxicology and exposure in the risk assessment that have not been examined by independent scientific peer reviewers for adequacy or accuracy. Additionally, none of U.S. EPA's calculations account for the extra vulnerability of the unborn fetus and children to toxic insults. We know that developing organisms are generally more sensitive than adults, yet no additional safety factors were applied to account for this sensitivity, as is usual for most pesticides. In fact, based on results from a questionable model of how the pesticide is detoxified by the body, U.S. EPA has actually decreased the size of the safety factors that typically add some level of protection from exposures to pesticides.

Finally, we are perplexed that U.S. EPA would even consider the introduction of a chemical like methyl iodide into agricultural use. The Agency has spent a great deal of effort to reduce industrial toxic emissions from chemical manufacturing plants. It is astonishing then that the Office of Pesticide Programs is working to legalize broadcast releases of one of the more toxic chemicals used in manufacturing into the environment.

As members of the scientific community, we urge you to do whatever is possible to prevent this chemical from ever becoming a registered pesticide. At the very least, we ask that you delay the decision and assemble a blue-ribbon panel of independent (conflict-free) scientists such as a committee of the National Research Council to provide peer review and scientific scrutiny of U.S. EPA's safety assessment of this chemical. We would be happy to suggest panel members.

Thank you for your consideration. Please note that titles and affiliations of the signatories below are for identification only. Opinions are personal and not institutional.

Sincerely yours,

Robert G. Bergman
Gerald E. K. Branch Distinguished Professor
University of California, Berkeley
Member, National Academy of Sciences

Roald Hoffmann
Nobel Laureate, Chemistry 1981
Frank H. T. Rhodes Professor of Humane Letters
Cornell University
Member, National Academy of Sciences

John B. Fenn
Virginia Commonwealth University
Nobel Laureate, Chemistry 2002
Member, National Academy of Sciences

Williams S. Knowles
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Robert H. Grubbs
Victor and Elizabeth Atkins Professor of Chemistry
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